



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

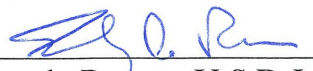
September 7, 2021

BY ECF AND EMAIL

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The parties' proposed pretrial schedule is approved.

It is SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 09/08/2021
New York, New York

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Judge Ramos:

On August 30, 2021, the Court's chambers informed the parties that that this matter had been slated as "second in line" for an October 5, 2021 trial date and that the case would proceed to trial if the first trial scheduled for that date did not go forward. The parties understand that that trial, *United States v. Daquan Anderson*, 20 Cr. 241, has been adjourned and that this matter is now first in line for the October 5 date.

Accordingly, the parties jointly propose the following pretrial schedule:

September 10	Government to produce witness list, any remaining Giglio or 3500 materials and exhibits (identified as of that date)
	Defense to provide notice of any advice of counsel defense
	All parties to file motions in limine, proposed voir dire questions, proposed jury instructions, and proposed verdict form.
September 21	Defense to produce witness list and 26.2 materials
September 24	Defense to produce exhibits (identified as of that date), including both (a) any non-impeachment exhibits to be offered through Government witnesses or otherwise during the Government's case; and (b) any exhibits to be offered in the defense case
September 27	All parties to file opposition to motions in limine

September 29 All parties to file any reply in support of motions in limine

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/
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cc: Counsel for Neil Cole (by ECF)